UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DONALD EUGENE WALKER and : CHAPTER 13

GLENDA J. WALKER

Debtors

JACK N. ZAHAROPOULOS

VS.

STANDING CHAPTER 13 TRUSTEE

Movant

DONALD EUGENE WALKER and GLENDA J. WALKER

Respondents : CASE NO. 1-22-bk-00100

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 3rd day of March, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

- 1. Debtors' plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, the debtor has excess non-exempt equity in the following:
 - a. Residential real estate. The Trustee has requested proof of the value of the debtors' home as stated in their schedules.
 - 2. The Trustee avers that debtors' plan is not feasible based upon the following:
 - a. Secured claims not in plan. (Quicken Loan Claim #1)

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 11th day of March, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Paul Murphy-Ahles, Esquire 2132 Market Street Camp Hill, PA 17011

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee